

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

J.H., by and through his next friend,)
Terina Gray; on behalf of himself)
and all persons similarly situated,)
)
Plaintiff,) Case No. 3:11-cv-00327-DPJ -FKB
v.)
HINDS COUNTY, MISSISSIPPI,)
)
Defendant.)
)
)

DECLARATION OF SHEILA A. BEDI

I, Sheila A. Bedi, counsel for the Plaintiff in the above captioned case, state that the following is true and correct to the best of my knowledge:

1. I am an attorney and the deputy legal director at the Southern Poverty Law Center. I submit this declaration in support of the Plaintiff's motion for class certification.
2. My ten-year practice focuses on civil rights and open government litigation in federal court. During my first two years of practice, I developed a prisoners' rights litigation project at the Georgetown University Law Center. My work in that project included constitutional litigation on behalf of an inmate with HIV/AIDS. *Smith v. Carpenter*, 316 F.3d 178 (2d Cir. 2003). I also monitored conditions at the District of Columbia Jail to ensure the District's compliance with the final order in *Inmates of D.C. Jail v. Jackson*, No. 75-1668 (D.D.C.).
3. My experience in federal district court includes actions under the Freedom of Information Act, *Morrison v. DOJ*, No. 02-01552 (D.D.C.); *Puerto Rican-Am. Research Inst. v. U.S. Dep't of the Army*, No. 02-02082 (D.D.C.); *Kothari v. DOT*, No. 03-00223 (D.D.C.); and

under Title VII of the Civil Rights Act of 1964, *Johnson-Harrison v. Beverly Health*, No. 01-01677 (D.D.C.). In addition to my work in district court, I have made several appearances in various courts of appeals. I represented amicus curiae, the Project on Government Oversight, in an employment discrimination matter in the Tenth Circuit. *Bastien v Campbell*, No. 02-1342 (10th Cir.). I have also briefed and argued civil rights actions in the Ninth and Eleventh Circuits. *Love v. Delta Air Lines*, 310 F.3d 1347 (11th Cir. 2002) (disability rights claim under the Air Carrier Access Act); and *Antonio-Martinez v. INS*, 317 F.3d 1089 (9th Cir. 2003) (appeal of asylum denial).

4. As an attorney with the Southern Poverty Law Center, I have participated as counsel in eight class action lawsuits involving the constitutional rights of incarcerated persons: *M.T., et al. v. Forrest County, Mississippi*, Case No. 2:11-cv-91-KS-MTP (S.D. Miss.) (class action on behalf of children detained at the Forrest County Juvenile Detention Center); *C.B., et al. v. Walnut Grove Correctional Authority, et al.*, Case No. 3:10-cv-663 DPJ-FKB (S.D. Miss.) (class action on behalf of youthful offenders incarcerated at the Walnut Grove Youth Correctional Facility); *E.W. v. Lauderdale County*, Case No. 4:09-cv-137 TSL-LRA (S.D. Miss.) (class action on behalf of children detained in the Lauderdale County Juvenile Detention Center); *D.W. v. Harrison County*, Case No. 1:09-cv-267 LG-RHN (S.D. Miss.) (class action on behalf of children detained in the Harrison County Juvenile Detention Center); *J.A. v. Barbour*, No. 3:07-cv-00394 (S.D. Miss) (class action on behalf of children incarcerated at the Columbia Training School); *K.L.W. v. James*, No. 2:04-cv-149BN (S.D. Miss.) (class action on behalf of children incarcerated at the Columbia Training School); *Morgan v. Sproat*, 432 F. Supp. 1130 (S.D. Miss. 1977) (monitoring State of Mississippi's compliance with judgment in conditions case on behalf of a class of incarcerated youth at Oakley Training School); and *Baker v. Campbell*, Case No. CV-03-C-1114-M (N.D. Ala.)

(class action on behalf of chronically ill prisoners at Alabama correctional facility). I have also participated as class counsel in other class action lawsuits involving the civil rights of minors: *J.W. v. Vallas*, Case No. 2:10-cv-01925 (E.D. La.) (class action on behalf of students subjected to unreasonable seizure and arrest in the Recovery School District).

5. Co-counsel in this case are highly qualified attorneys who have particular expertise in the rights of institutionalized children:

Jody E. Owens II is an attorney with the Southern Poverty Law Center with experience working with youth and the juvenile justice system. During his time with the Southern Poverty Law Center, Mr. Owens has participated as class counsel in three class action lawsuit involving the constitutional rights of incarcerated youth: *M.T., et al. v. Forrest County, Mississippi*, Case No. 2:11-cv-91-KS-MTP (S.D. Miss.) (class action on behalf of children detained at the Forrest County Juvenile Detention Center); *C.B., et al. v. Walnut Grove Correctional Authority, et al.*, Case No. 3:10-cv-663 DPJ-FKB (S.D. Miss.) (class action on behalf of youthful offenders incarcerated at the Walnut Grove Youth Correctional Facility); *D.L. v. Slattery*, Case No. 10-61902-CIV-MOORE/SIMONTON (S.D. Fla.) (class action on behalf of children incarcerated at the Thompson Academy). While at the firm Butler, Snow, O'Mara and Stevens prior to joining the Southern Poverty Law Center, Mr. Owens served as the lead attorney on more than twenty civil rights lawsuits, a number of which addressed the constitutional rights of incarcerated people. From these, he has extensive experience handling such litigation in federal district court in bench trials and before a jury, and on appeal to the Fifth Circuit Court of Appeals.

Poonam Juneja is an attorney with the Southern Poverty Law Center with experience working with youth and the juvenile justice system. During her time with the Southern Poverty Law Center, Ms. Juneja has participated as class counsel in two class action lawsuit involving the constitutional rights of incarcerated youth: *M.T., et al. v. Forrest County, Mississippi*, Case No. 2:11-cv-91-KS-MTP (S.D. Miss.) (class action on behalf of children detained at the Forrest County Juvenile Detention Center); *E.W. v. Lauderdale County*, Case No. 4:09-cv-137 TSL-LRA (S.D. Miss.) (class action on behalf of children detained in the Lauderdale County Juvenile Detention Center). She has also done substantial work on behalf of children in educational settings. See, e.g., *J.W. v. Vallas*, Case No. 2:10-cv-01925 (E.D. La.) (class action on behalf of students subjected to unreasonable seizure and arrest in the Recovery School District). She has significant law school clinical experience, including work with abused youth and neglected children in Connecticut, and has a background in juvenile justice policy.

Corrie Cockrell is an attorney with the Southern Poverty Law Center with experience working with youth and the juvenile justice system. During her time with the Southern Poverty Law Center, Ms. Cockrell has participated as class counsel in one class action lawsuit involving the constitutional rights of incarcerated youth: *M.T., et*

al. v. Forrest County, Mississippi, Case No. 2:11-cv-91-KS-MTP (S.D. Miss.) (class action on behalf of children detained at the Forrest County Juvenile Detention Center). Ms. Cockrell has also done extensive work with youth incarcerated in different secure settings throughout the state of Mississippi, including in local juvenile detention centers and Oakley Training School. Ms. Cockrell has also participated in federal litigation involving child custody and immigrants' rights. *Cruz v. Mississippi Department of Human Services et. al.*, Case No. 3:10-cv-446-HTN-LRA (S.D. Miss.).

Wendy White is the managing attorney at Disability Rights Mississippi, a non-profit organization with a federal mandate to protect and advocate for the rights of persons with disabilities in Mississippi, including children with disabilities who are confined to juvenile detention centers. In this capacity, Mrs. White has engaged in extensive advocacy on behalf of individuals with disabilities throughout the state of Mississippi. Prior to this, Mrs. White served on the Advisory Council for Disability Rights Mississippi for seven years. During the ten years that Mrs. White has practiced law in Mississippi, she has handled a wide range of legal matters, including a diverse practice of both individual plaintiff's and defense litigation in a variety of substantive areas. Mrs. White has extensive experience appearing in state and federal court at both the trial and appellate levels.

6. I am a member in good standing of the bars of the state of Mississippi and the U.S. District Court for the Southern District of Mississippi.
7. The Southern Poverty Law Center has sufficient funds available to finance the costs of this litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 1, 2011.

/s/ Sheila A. Bedi, MS Bar No. 101652
Mississippi Youth Justice Project
Southern Poverty Law Center
921 N. President Street, Suite B
Jackson, Mississippi 39202
601-948-8882 (telephone)
601-948-8885 (fax)
sheila.bedi@splcenter.org